

November 18 2019 1:43 PM

KEVIN STOCK
COUNTY CLERK
NO: 19-2-12198-5

STATE OF WASHINGTON
PIERCE COUNTY SUPERIOR COURT

STATE OF WASHINGTON,

Plaintiff,

v.

VETERANS INDEPENDENT
ENTERPRISES OF WASHINGTON,

Defendant.

EVENT NO.

DECLARATION OF JACQUELINE
FRANKLIN

I, JACQUELINE FRANKLIN, make this declaration based upon personal knowledge. I
am over the age of 18 and competent to testify to the matters set forth herein.

1. I am a Senior Investigator for the Attorney General's Office (AGO) since May 1,
2013.

2. My education includes an A.A. degree in Criminal Justice with an emphasis in
Law Enforcement from Austin Community College in 1994, a B.S. degree in Computer
Networking from Strayer University in 2004, and M.A. in Forensic Psychology from Argosy
University in 2011. In addition to my education, I have received extensive training in criminal
investigations from the AGO, National Association of Medicaid Fraud Control Units
(NAMFCU), Federal Law Enforcement Training Center, Department of Justice, Association of
Inspectors General, Health and Human Services, National Health Care Anti-Fraud Association,

1 the WA Department of Revenue (DOR), the CA Tax and Fee Administration, WA State
2 Department of Social and Health Services, and Department of Labor and Industries (LNI).

3 3. I am familiar with the investigation into Veterans Independent Enterprises of
4 Washington (UBI 601 064 518) located in University Place, Pierce County, WA and Gary
5 Peterson, Donald Hutt, and Rosemary Hibbler. The facts in this affidavit come from my
6 training and experience, review of the evidence, investigation, as well as information
7 obtained from other investigators, agents and witnesses including agents employed by LNI.
8 I also conducted voluntary recorded interviews of Peterson, Hutt, and Hibbler.

9 4. On or about October 29, 2018, Hibbler in a recorded interview stated, "I did have
10 a gambling problem, but I no longer gamble".

12 5. On or about November 21, 2018, after reviewing Hibbler bank statements that
13 showed withdrawals at local area casinos. Senior Investigator Kim Triplett-Kolerich and I went
14 to Macau Casino in Lakewood, WA and Iron Horse Casino in Auburn, WA.

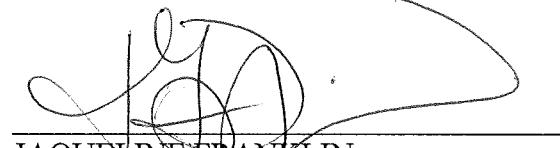
15 6. On or about November 21, 2018, I requested and received from the Macau
16 Casino customer history for Rosemary Hibbler from January 1, 2012 to November 21, 2018.

18 7. Review of the Macau Casino records show that on or about October 29, 2018 to
19 November 20, 2018, Rosemary Hibbler presented cash and played \$23,705 at the casino. These
20 records also showed that Rosemary Hibbler has a significant gaming habit. Other records
21 reviewed showed that Rosemary Hibbler's sole source of income was her job with Veterans
22 Independent Enterprises of Washington (VIEW). Records showed that Rosemary Hibbler had
23 access to VIEW's bank accounts. Casino records provided to AGO show that from January to
24 December 2018, Hibbler gambled \$194,476 and lost \$108,571 to casinos.

1 8. On or about November 27, 2018, I received from the Macau Casino a CD
2 containing video footage of Rosemary Hibbler enter at the Macau Casino on November 19,
3 2018 entering at 23:55:42 hours, and leaving the Macau Casino on November 20, 2018 at
4 05:33:06 hours. During that time, Rosemary Hibbler is observed on camera at a gaming table.
5 I observed from the video footage and counted the cash that Rosemary Hibbler presented. It
6 totaled \$4,986 in cash.

7 I certified under penalty of perjury under the laws of the State of Washington that the
8 foregoing is true and correct.
9

10 11 DATED 10/14 day of November, 2019.

12 13 
14 15 JAQUELINE FRANKLIN
Senior Investigator
Office of the Attorney General